

November 16, 2025

Esteban Danna
Planning Division
Development Services Department, City of Encinitas
505 South Vulcan Avenue,
Encinitas, CA 92024
edanna@encinitasca.gov

Re: CEQA Comments on Ocean Bluff Residential Project – Stormwater Conveyance and Infrastructure Responsibilities

Dear Mr. Danna,

I am writing concerning the Ocean Bluff Draft Environmental Impact Report (CASCH 2024080571) as a member of a longtime property-holding family at 748 Requeza Street. I submit these comments as a retired biological consultant with more than 30 years professional experience conducting biological surveys, impact assessments, and mitigation and monitoring plans consistent with state and federal laws and local policies throughout California. This letter expands upon the comments I raised in my letter to you dated June 24, 2025.

Details of the proposed off-site storm water management system are lacking in the project proponent's Preliminary Hydrology Study (Pasco Laret Sutter & Associates, LLC, 2024; Appendix K). This study describes bio-filtration basins focusing solely on Best Management Practices to limit the offsite transport of sediment and pollutants. Discussion of the existing stormwater conveyance systems seems inadequate, especially considering that these systems are of an old design and highly prone to failure.

The only cross-section I could locate stops at the uphill edge of the basins; it does not show the downhill sides. (See Section Cut A-A in the preliminary grading plans.) Based on the plan view of the grading plans, both basins would connect to new, buried 18" PVC pipes with outfalls at the top of an existing PCC brow ditch. The ditch conveys flows downslope more than 40 vertical feet, where they discharge through approximately 20 feet of unarmored ground, and are then directed into an existing "L" shaped splash wall. Runoff is then routed through a reinforced concrete pipe that connects to a catch basin that ties into a public storm drain inlet.

As mentioned above, this existing stormwater conveyance system has been in place for many years, likely decades. The attached aerial and ground-level photographs illustrate how steep and incised the slope below the proposed development is. And while the hydrology study seems to infer that increased flows into the existing system are minimal, the City of Encinitas should demand more details on how the project might affect the existing stormwater system.

Specific concerns include but are not limited to the following:

1. What entity owns and is therefore responsible for the existing brow ditch, "L" shaped splash wall, reinforced concrete pipe, and catch basin at the base of the slope?
2. Provide a more thorough discussion of how the existing stormwater system would function and whether improvements are called for.

3. Provide a detailed discussion of how repairs for any future failures of the existing stormwater system would be implemented and how they would be funded.

It is in the City's interest that all liability for any future failure of the stormwater conveyance system on the subject property would fall on the Ocean Bluff Homeowners' Association (HOA). However, HOAs are notoriously ill-equipped and underfunded to undertake costly slope failures and infrastructure repairs. I feel that a better solution would be to require the establishment and funding of Geologic Hazard Abatement District (GHAD). As I mentioned in my June 24 letter, the GHAD would also be a much-preferred method for implementing a habitat management and monitoring program to ensure the preservation of the existing sensitive habitats and species known to occur on the property.

Sincerely,

Mike Wood
Wood Biological Consulting (retired)

Attachments: Photographs of the subject property

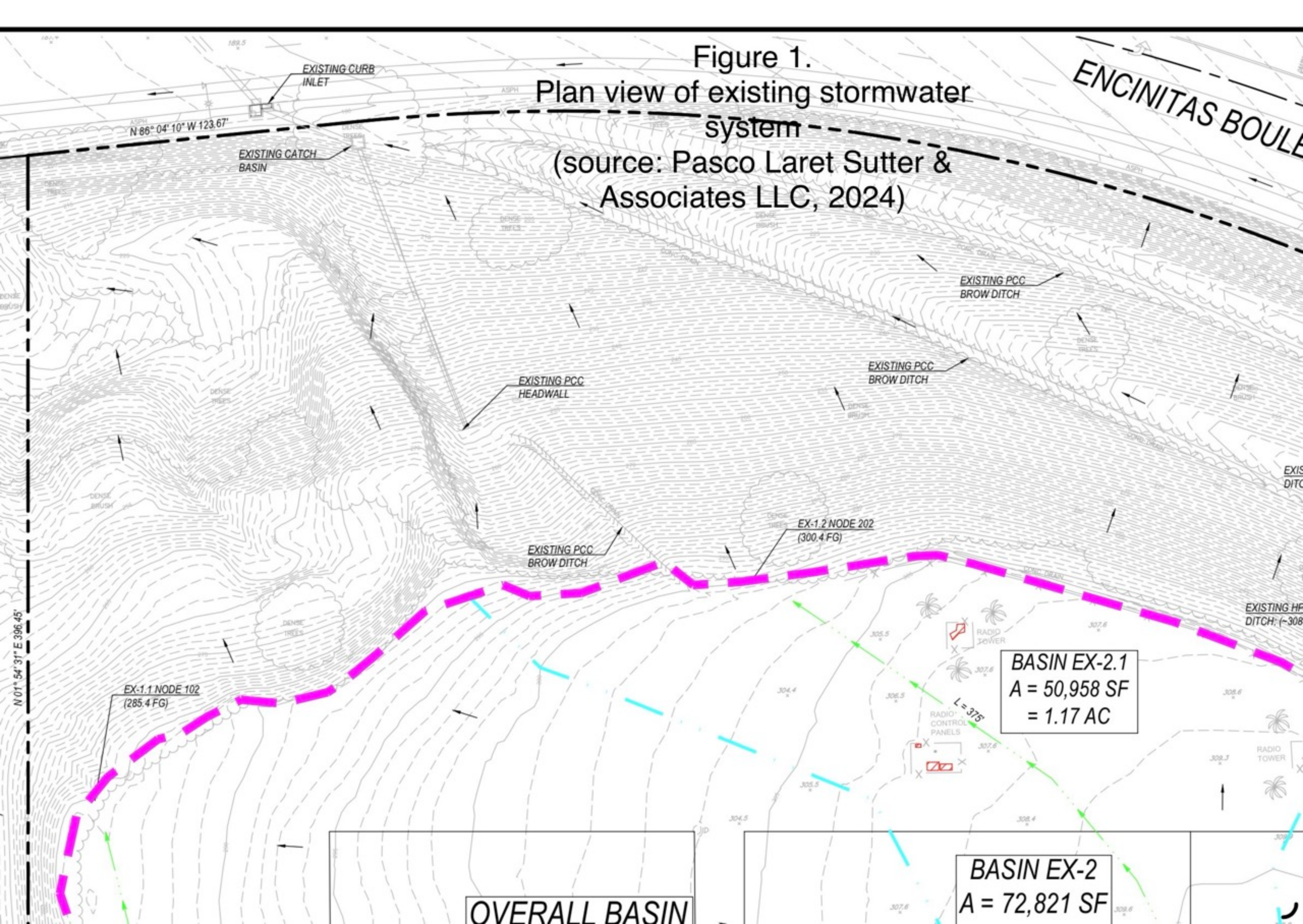


Figure 1.
Plan view of existing stormwater
system
(source: Pasco Laret Sutter &
Associates LLC, 2024)

ENCINITAS BOULEVARD

EXISTING CURB
INLET

EXISTING CATCH
BASIN

EXISTING PCC
HEADWALL

EXISTING PCC
BROW DITCH

EXISTING PCC
BROW DITCH

EXISTING PCC
BROW DITCH

EX-1.2 NODE 202
(300.4 FG)

EX-1.1 NODE 102
(285.4 FG)

BASIN EX-2.1
A = 50,958 SF
= 1.17 AC

BASIN EX-2
A = 72,821 SF

OVERALL BASIN



ex. reinforced
concrete pipe

Encinitas Blvd

Encinitas Blvd

Encinitas Blvd

Rosebay Dr
Rosebay Dr

Figure 2.
Aerial view of existing storm drain system
(source: Google Earth)

30 m



Figure 3.
Aerial view of existing storm drain system
(source: Google Earth)

30 m



Encinitas, CA

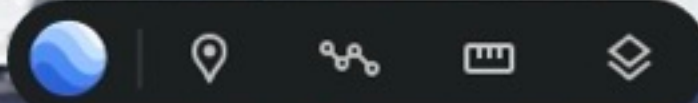


ex. reinforced
concrete pipe



Figure 4.

Oblique aerial view of existing storm drain system
(source: Google Earth)



10 m

2D



Figure 5.
Oblique aerial view of existing storm drain system
(source: Google Earth)



ex. reinforced
concrete pipe

Figure 6.
Street view of existing storm drain system
(source: Google Earth)



ex. brow ditch

ex. reinforced
concrete pipe

Figure 7.
Street view of existing storm drain system
(source: Google Earth)